

LOCK THE GATE ALLIANCE

AUSTRALIANS WORKING TOGETHER TO PROTECT OUR LAND, WATER, AND FUTURE 

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Submitted via Departments website

28th October 2013.

Submission: Rocky Hill Coal Project (SSD-5156).

The Lock the Gate Alliance (LTGA) appreciates the opportunity to make this submission on the proposed Rocky Hill Coal Project (SSD-5156).

LTGA is a national organisation of groups advocating to protect land, water, and communities from reckless mining developments, and to empower local communities to determine their own futures. The membership of our Alliance includes individuals and community groups in the Gloucester valley, and we work closely with communities in the area of the proposed Rocky Hill Coal Project (RHCP).

We object to the approval of the RHCP because it is unwanted by the Gloucester community, and because it would cause unacceptable harm to water resources, public health, and the local economy. The proposed site in question is unsuitable for mining, due to its proximity to residential areas and its location on valuable agricultural land in a flood plain. LTGA submits that the RHCP must not be approved in its current form, or in any form, and that the application must be rejected outright.

Health impacts

The RHCP Stage 1 proposal is just 900 metres from the nearest residential area of Forbesdale, and there are several other residential areas within two kilometres of the project. The area has a quiet, idyllic, rural atmosphere, with clean air, and close-knit communities. All this would be lost if the RHCP is approved. Open cut coal mining is completely incompatible with residential areas, due to:

- Respiratory health impacts from particle pollution associated with land disturbance, and operation of machinery. These include particle sizes PM10 and PM2.5. Less than two weeks

ago, the World Health Organisation classified such particle pollution as a Group 1 Carcinogen¹.

- Respiratory health impacts from blasting, including toxic emissions of nitrogen and sulphur oxides.
- Health impacts associated with noise from mining and blasting operations.

Disingenuous tactics and contempt for the community

The RHCP proponent, Gloucester Resources Limited, has consistently acted dishonestly and with contempt for the local community. Examples of this include:

- Purchasing land for the mining project in secret, under various names.
- Lack of community consultation. Nearby residents of the proposed site report having never seen a representative of the company.
- Splitting the project into “stages” to conceal the full extent of the proponents plans. While the current application is for “Stage 1” of the project, it is known that the company plans at least one more stage, possibly more, and that further developments are likely to bring the mine even closer to residential areas.

Social and economic impacts

The RHCP has already impacted negatively on the Gloucester economy, through pushing dairy farmers and other residents out of the area, and buying up valuable farmland, which is now earmarked for destruction. It is standard practice for mine proponents, and their consultants, to significantly overestimate the economic benefits of their projects to the public, and to significantly underestimate the lost opportunities and impacts on other industries that result from opening up a new area to mining. This problem was confirmed in the NSW Land and Environment Court by Justice Brian Preston on 15th April 2013, when he found that the proponents of the Warkworth Extension had dramatically overplayed the economic benefits of the project². Justice Preston also found that the environmental, economic, and social impacts of the proposed Warkworth Extension far outweighed the benefits of the project, and overturned the Minister's approval. LGTA submits that the social and economic impacts of the RHCP far exceed any benefits the project may bring, and that it must be rejected.

Democracy and self-determination for Gloucester

Gloucester Shire Council has resolved unanimously to oppose the development of the RHCP, and has surveyed its residents on mining related issues. The Council's survey found that 88.1% of respondents were opposed to mining in zoned Environmental and Scenic Protection areas, such as the RHCP. This gulf between the aspirations of the local community, and the the plans of mining

1 *IARC: Outdoor air pollution a leading environmental cause of cancer deaths*, World Health Organisation media release, 17th October 2013. http://www.iarc.fr/en/media-centre/pr/2013/pdfs/pr221_E.pdf

2 *Bulga Milbrodale Progress Association Inc v Minister for Planning and Infrastructure and Warkworth Mining Limited* [2013] NSWLEC 48

companies and their spruikers in Government, is not unique to the Gloucester area, although this is one of the worst examples. As the Department would be aware, tensions between rural communities and mining developments are escalating across the state. The NSW Government has, so far, failed abjectly to resolve this problem, and to allow communities a say in determining their future. Unless this is changed, tensions will continue to escalate to a crisis point.

Impacts on groundwater

LTGA rejects the assertion of the proponent, in the Environmental Impact Statement, that the project will have “no impact” on groundwater, and “no measurable impact” on Waukivory Creek or the Avon River.” It is common practice for mining proponents, and their consultants, to underestimate or downplay the impacts on water resources of their project. One recent example of this occurred in Emerald, Queensland, where farmer Paul Murphy graphed independently collected bore water data from his farm, finding that groundwater levels had dropped more than five times the amount predicted by mining proponents in their environmental studies³.

Thank you

A handwritten signature in black ink, appearing to read 'Steve Phillips', with a stylized flourish at the end.

Steve Phillips
Hunter Regional Co-ordinator
Lock The Gate Alliance

3 http://www.lockthegate.org.au/damning_new_data_groundwater_impacts_from_qld_coal_mining_five_times_worse_than_miners_modelling_predicted